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SANTA CRUZ COUNTY GROUP

-----Of The Ventana Chapter-----
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May 26, 2009

Attn: Ms. Mary Adams
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
BY FAX: (805) 543-0397 (centralcoast@waterboards.ca.gov)

Dear Ms. Adams:

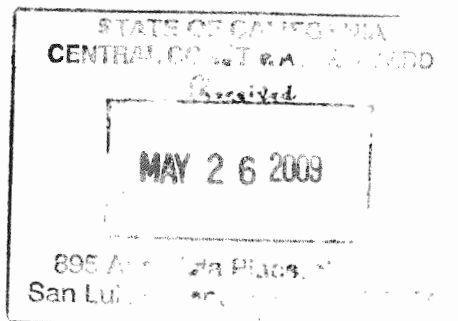
Thank you for the opportunity to submit comments on the Draft 2008 303(d) List of Water Quality Limited Segments (303(d) list). Sierra Club, Santa Cruz Group, strongly supports the additions proposed by the Board's staff to the 2008 303(d) list and strongly urges the Water Board to endorse the addition of these hundreds of water quality impaired segments to the 2008 303(d) list.

This is an essential first step, but without follow through our streams will continue to remain impaired, harming humans, fish and other water dependent species. We urge the Water Board to work with the State Water Resources Control Board, and other responsible agencies, in adopting aggressive Total Maximum Daily Load (TMDL) cleanup plans that restore beneficial uses for existing listings, and for new listings being proposed for addition to the list. We believe that preparation of these TMDLs must happen in a timely fashion in order to limit the amount of harm such impaired waterbodies may cause.

In addition to development of TMDLs, implementation of these cleanup plans must be given high priority. Clean up can't be delayed for dozens of years and violators need to be held accountable.

We only support the delisting of 303(d)-listed impaired waterways when it has been demonstrated, with a preponderance of evidence, that water quality has been completely restored to protect beneficial uses. We support delistings for the purpose of adding more specificity in defining impairments, only with certain caveats. As long as general listing removals (i.e. pathogens) are replaced by identifying each of the specific pollutants that apply (i.e. fecal coliform and/or E. Coli), and TMDL implementation dates are not delayed by the de-listing/re-listing process, we support such delistings. We do not support any process that resets the clock on the Board's mandate to address listings through the TMDL cleanup process, thereby delaying development of a TMDL and eventual implementation.

We appreciate your consideration of these comments in your process of drafting the final 2008 303(d) List of Water Quality Limited Segments for California's Central Coast. Thank you.



Sincerely,

Aldo Giacchino

Aldo Giacchino, Chair
Sierra Club—Santa Cruz County Group

"...to explore, enjoy and protect the wild places of the earth."

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